

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

MARK HILLIS,
a/k/a "Daddy," a/k/a "Denverpolice#666"

Case No.

20-__636_-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of see attached Affidavit in the county of Montgomery in the
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2251(a), (e) and 2(b)

Manufacture, attempted manufacture, and willfully causing the manufacture
of child pornography

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

/s/ Lisa M. Reinhold

Complainant's signature

Lisa M. Reinhold, Special Agent, ICE, DHS

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/23/2020

/s/ Jacob P. Hart, U.S.M.J.

*Judge's signature*City and state: Philadelphia, Pennsylvania

Hon. Jacob P. Hart, U.S.M.J.

Printed name and title

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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND WARRANT

I, Lisa M. Reinhold, a Special Agent with Homeland Security Investigations, being duly sworn, depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations ("HSI"), assigned to the Special Agent in Charge in Philadelphia, Pennsylvania, and I have been so employed since November, 2001. As part of my daily duties as an HSI agent, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt and possession of child pornography, in violation of 18 U.S.C. §§ 2251(a), 2252(a), and 2252A. I have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have also participated in the execution of search warrants, a number of which involved child exploitation and/or child pornography offenses, including enticement of a minor, in violation of 18 U.S.C. § 2422(b), manufacture of child pornography, in violation of 18 U.S.C. § 2251, travel with the intent to engage in illicit sexual activity in violation of 18 U.S.C. § 2423(b), and child pornography offenses in violation of 18 U.S.C. § 2252 and 2252A.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. I make this affidavit in support of an application for an arrest warrant for MARK HILLIS, further described in Attachment A.

4. I submit this affidavit seeking the issuance of an arrest warrant for, and a criminal complaint charging, MARK HILLIS, with employing, using, persuading, inducing, enticing, or

coercing a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and any attempts to do so, knowing that such visual depiction would be transmitted using any means or facility of interstate or foreign commerce, or transported in or affecting interstate or foreign commerce by any means, in violation of Title 18, United States Code, Section 2251(a).

5. The facts in this affidavit are based in part on my investigation of this matter and on information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

Probable Cause

6. On or about December 30, 2019, a Montgomery County man reported to Pennsylvania State Police that his 13 year old daughter ("Minor #1") was sexually assaulted by a white male named "Mark." He stated that the assault occurred in the very early morning hours on December 30, 2019, at the Hampton Inn, 430 Linfield-Trappe Road, Limerick Township, Montgomery County, Pennsylvania.

7. On or about December 31, 2019, members of the Limerick County Police Department began an investigation into the reported sexual assault. I have spoken with Detective Ernie Monis about that investigation and I have reviewed and relied upon the police reports, images, communications, and other documentation and evidence collected by the Limerick County Police Department as part of that investigation.

8. On December 31, 2019, during interviews with law enforcement, a child advocate,

and/or a healthcare professional. Minor #1 reported that she had met "Mark" on YouTube and had agreed to meet him in person. She advised that she left the family residence in the middle of the night, walked to a local pizza shop where she met "Mark," and from there, "Mark" drove her to the Hampton Inn. She also reported that prior to meeting him in person, she sent and received text messages to and from "Mark" over the course of a month or two. She stated that "Mark" asked her to call him "Daddy" and that he used two phones with different phone numbers to communicate with her. She explained that she had saved "Mark's" phone number for his non-Apple device (734-833-8339) as "Hi" in her own iPhone contacts, and she saved "Mark's" phone number for his Apple device (269-290-9529) as "Hi2" in her own iPhone contacts.

9. That same day, the Limerick County Police Department obtained consent from Minor #1's father to pose as Minor #1 and to use her phone to contact "Mark." On December 31, 2019, Detective Christopher Iochum sent text messages to "Mark" or "Hi2" from Minor #1's phone and encouraged him to return to the area.

10. Shortly thereafter, on the same day, Detective Iochum received notification that a Mark Hillis had just returned to the Hampton Inn on Linfield-Trappe Road in Limerick Township and checked in to Room 102. Hotel staff reported that Hillis had stayed at that hotel the night before in Room 111, which is the same room that Minor #1 reported as the location of the sexual assault. The hotel staff reported that Hillis provided a home address in Southgate, Michigan and he was driving a vehicle with Michigan license plates.

11. Using that information, members of the Limerick County Police Department found Hillis nearby at the Limerick Car Wash on Lewis Road in his Hyundai Sonata with Michigan tags. Hillis confirmed his identity and agreed to speak with the detectives at the Limerick County Police Department station. After confirming in writing that he received, understood, and waived his

Miranda rights, Hillis confirmed that he met Minor #1 on YouTube and that he had taken her to the Hampton Inn the night before. He told detectives the password for the two phones observed in his vehicle was 0101. Following the interview on December 31, 2019, Hillis was arrested and then charged criminally in the Montgomery County Court of Common Pleas, in docket number CP-46-MD-0000387-2020. Hillis is currently detained in the Montgomery County Prison.

12. On or about January 2, 2020, Detective Paul Marchese obtained a search warrant from a Montgomery County Magisterial Judge to search Hillis's Hyundai Sonata for evidence, including cell phones. Pursuant to that search, he recovered a Samsung Galaxy J3 phone and an iPhone 7 from Hillis's car. On or about January 2, 2020, Detective Marchese also obtained a search warrant to search for and seize identifiers, texts, emails, images, videos, and other data on those two phones.

13. After obtaining the search warrants, Detective Lochum conducted a forensic download of the two phones recovered from Hillis's car. According to reports from Detective Moitis, the iPhone 7 in Hillis's possession contained more than 100 images of Minor #1 posing nude or semi-nude. It also contained more than 20 videos of Minor #1 posing nude or partially nude and/or engaging in sexual activity.

14. I have reviewed those images and hundreds of text messages between Hillis and Minor #1 that were recovered from the two phones found in Hillis's car. On multiple occasions prior to December 25, 2019, Minor #1 told Hillis via text message that she is 13 years old.

15. In addition, the iPhone 7 found in Hillis's car contains numerous text messages between Hillis and Minor #1 from Christmas Day 2019. In many of those communications, Hillis requests and directs Minor #1 to send him sexually explicit pictures and videos of herself. During one such text exchange on December 25, 2019, Hillis directed Minor #1 to insert the handle of a

hairbrush into her vagina, and the victim complied, producing a video which depicted her inserting and moving the handle of a hairbrush in her vagina.

16. I have reviewed all of the text communications with attachments exchanged between Hillis and Minor #1 on or about December 25, 2019. In my opinion, the video produced at the direction of the defendant cited in the preceding paragraph of this affidavit depicts child pornography as defined in 18 U.S.C. § 2256, namely, Minor #1 engaged in sexually explicit conduct, including masturbation and/or the lascivious exhibition of her genitals or pubic area.

Conclusion

17. Based upon the information above, I respectfully submit that there is probable cause to believe that MARK HILLS, date of birth January 6, 1963, did manufacture and/or attempt to manufacture, and willfully caused the manufacture of child pornography, in violation of Title 18, United States Code, Sections 2251(a), (e), and 2(b), as more fully set forth in Attachment A

18. Therefore, I respectfully request that the attached warrant be issued authorizing the arrest of MARK HILLIS, date of birth January 6, 1963.

/s/ Lisa M. Reinhold___
LISA M. REINHOLD
Special Agent
Department of Homeland Security

SWORN TO AND SUBSCRIBED
BEFORE ME THIS 23rd DAY
OF APRIL 2020, AT 9:18 AM.

/s/ Jacob P. Hart _____
JACOB P. HART
United States Magistrate Judge

ATTACHMENT A

Count One

Manufacture, Attempted Manufacture, and Willfully Causing the Manufacture of Child Pornography, 18 U.S.C. § 2251(a), (e) and 2(b):

On or about December 25, 2019, in the Eastern District of Pennsylvania, in the Eastern District of Michigan, and elsewhere, defendant **MARK HILLIS** employed, used, persuaded, induced, enticed and coerced Minor **#1** to engage in sexually explicit conduct for the pmpose of producing a visual depiction of that conduct, and attempted to do so, and willfully caused Minor **#1** to do so, that is, by soliciting Minor **#1** to photograph herself engaging in a sexually explicit conduct and directing her to transmit the image to defendant **MARK HILLIS** via the Internet, and **MARK HILLIS** knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transpmtd in and affecting interstate or foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.